

FILED

JAN 18 2023

U.S. DISTRICT COURT-WVND  
MARTINSBURG, WV 25401

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

RODNEY ALLEN MAYHEW and  
CHRISTY SUE CARTER

Defendants.

Criminal No.

3:23CR10

Violations:

18 U.S.C. § 2  
18 U.S.C. § 922(a)(6)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(a)(2)  
18 U.S.C. § 924(a)(8)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(False Statement in Connection with the Acquisition of a Firearm)

On or about March 18, 2021, in Berkeley County, in the Northern District of West Virginia, defendant **CHRISTY SUE CARTER**, aided and abetted by **RODNEY ALLEN MAYHEW**, in connection with the acquisition of a firearm, that is Strassell's Machine, Inc. (Trade Name: Hi-Point), semi-automatic, model C9, 9mm Luger pistol, serial number P10108925, from a licensed dealer of firearms, did knowingly make a false written statement that was intended and likely to deceive such dealer with respect to a fact material to the lawfulness of the sale of such firearm, that is the defendant was the actual buyer of the firearm; in violation of Title 18, United States Code, Section 2, and Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT TWO**

(False Statement in Connection with the Acquisition of a Firearm)

On or about March 20, 2022, in Berkeley County, in the Northern District of West Virginia, defendant **CHRISTY SUE CARTER**, aided and abetted by **RODNEY ALLEN MAYHEW**, in connection with the acquisition of a firearm, that is Glock Inc., semi-automatic, model 425, .380 caliber, serial number AGDN903, from a licensed dealer of firearms, did knowingly make a false written statement that was intended and likely to deceive such dealer with respect to a fact material to the lawfulness of the sale of such firearm, that is the defendant was the actual buyer of the firearm; in violation of Title 18, United States Code, Section 2, and Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT THREE**

(Unlawful Possession of a Firearm)

On or about July 24, 2022, in Berkeley County, in the Northern District of West Virginia, the defendant, **RODNEY ALLEN MAYHEW**, knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, that is, the offense of Distribution of a Fake Controlled Dangerous Substance, in case number 10-K-09-047007, in the Circuit Court for Frederick County, Maryland, knowingly possessed a firearm in and affecting interstate commerce, that is, Strassell's Machine, Inc. (Trade Name: Hi-Point), semi-automatic, model 3895, .380 caliber rifle, serial number Y05112; Strassell's Machine, Inc. (Trade Name: Hi-Point), semi-automatic, model C9, 9mm Luger pistol, serial number P10108925; and, Glock Inc., semi-automatic, model 425, .380 caliber, serial number AGDN903; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**FORFEITURE ALLEGATION**

*Gun Control Act*

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6), 922(g)(1), 924(a)(2), and 924(a)(8), including assorted ammunition, firearm parts, and

1. A Strassell's Machine, Inc. (Trade Name: Hi-Point), semi-automatic, model 3895, .380 caliber rifle, serial number Y05112;
2. A Strassell's Machine, Inc. (Trade Name: Hi-Point), semi-automatic, model C9, 9mm Luger pistol, serial number P10108925;
3. A Glock Inc., semi-automatic, model 425, .380 caliber, serial number AGDN903;
4. 108 rounds of assorted handgun ammunition;
5. 1 Magazine, 1 Laser Sight, 1 Optical Sight, 1 Forward grip; and
6. 1 Nylon Bag.

A true bill,

/s/  
Grand Jury Foreperson

/s/  
WILLIAM IHLENFELD  
United States Attorney

Kimberley D. Crockett  
Assistant United States Attorney